

NCR Docket No.9049

REMARKS

Claims 1-26 were rejected under 35 USC 103(a) in view of Wong and Choy. Applicant has amended the independent claims and canceled claim 12, leaving claims 1-11 and 13-26 pending in this application. Applicant asks that all claims be allowed.

Neither Wong nor Choy shows a data-warehousing consortium arrangement in which two "unrelated business entities" pool "business-related data" that "describes one or more aspects of the operations of each of the business entities," as claimed. Wong describes a traditional enterprise-wide database model in which the "different departments" of a business entity share a common database system to eliminate the "fragmentation of information" that results when each department maintains its own database system. (*See col. 2, lines 11-16 and 47-50.*) Wong's model provides "'seamless' end-to-end internal business processes." (Col. 4, lines 18-19, emphasis added.) It does not serve to integrate the business-operations data of two unrelated business entities.

As part of this system, Wong does allow an external business entity to "place an order" for goods or services through the Internet "in accordance with a pre-existing agreement" (col. 4, lines 32-35), but this type of on-line order placement is not at all akin to the pooling of "business related data" that "describes one or more aspects of the business operations" of two unrelated businesses. The kind of "business-related data" that one business would share with another in placing an order for goods or services says nothing about the business operations of the company placing the order. Wong's system, unlike Applicant's, gives each companies absolutely no insight into the business operations of the other. Wong therefore fails to show or even suggest the subject matter of Applicant's claims. Choy also does not show nor suggest the sharing of data describing aspects of the business operations and thus, even when combined with Wong, does not show or suggest Applicant's invention.

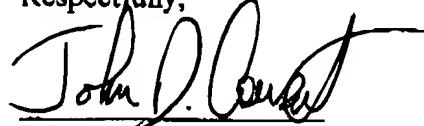
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CONCLUSION

The Wong and Choy references, even when combined, do not show or suggest the invention claimed by Applicant. Therefore, all of the claims are allowable over these references. Applicant asks the Office to reconsider this application and allow all of the claims.

The Office is authorized to charge any fees that may be due, except for the issue fee, to deposit account 50-1673.

Respectfully,



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